

REMARKS

In response to the Office Action dated November 15, 2005, Applicants respectfully request reconsideration based on the above claim amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 31-42 and 44 were rejected under 35 U.S.C. 102(e) as being unpatentable by Amini. This rejection is traversed for the following reasons.

Claim 31 as amended recites, *inter alia*, "wherein when the sensing apparatus detects the triggering event the internal computer system establishes a communication session with the outside entity via a public communications network in direct communication with the location, the public communications network including at least one of a public switched telephone network and a wireless communication link." As described on page 21, line 19 to page 22, line 8, embodiments of the invention establish communication with an outside entity using at least one public communication network. Amini fails to teach this feature.

Amini uses a private network 340 to establish communications between the client site 310 and the off-site storage site 330. As taught by Amini, the private network increases security features. Amini contrasts the private network 340 with conventional dial up networks in prior art Figure 2 (column 6, lines 13-33). Thus, Amini fails to teach establishing a communication session over a public network.

For at least the above reasons, claim 31 is patentable over Amini. Claims 32-34 depend from claim 31 and are patentable over Amini for at least the reasons advanced with reference to claim 31.

Independent claims 36 and 41 recite features similar to those discussed above with reference to claim 31. Claims 37-40 depend from claim 36 and claims 42 and 44 depend from claim 41. Thus, claims 36-42 and 44 are patentable over Amini for at least the reasons advance with reference to claim 31.

Claim 45 was rejected under 35 U.S.C. § 103 as being unpatentable over Amini in view of Vaios. This rejection is traversed for the following reasons.

Claim 45 recites "wherein the triggering event is a call from a voice-over-Internet-protocol (VOIP) device." The Examiner relies on Vaios as allegedly disclosing a call from a VOIP device as a triggering event. Vaios discloses TCP/IP communications between the

remote site and the monitoring site, but does not teach or suggest VOIP. Further, there is no teaching in Vaiois that a VOIP call is a triggering event, which leads to the processing recited in claim 41. Assuming, arguendo, that there is some teaching of establishing a VOIP call, there is no teaching that the VOIP call serves as a triggering event. The triggering events in Amini are events detected by sensors or time periods. Thus, even if Amini and Vaiois are combined, the features of claim 45 do not result.

For at least the above reasons, claim 45 is patentable over Amini in view of Vaiois.

For at least the reasons advanced above, it is respectfully submitted that the application is in condition for allowance. Accordingly, reconsideration and allowance of the claims are respectfully requested. The Examiner is cordially requested to telephone, if the Examiner believes that it would be advantageous to the disposition of this case.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment, which may be required for this amendment, to Deposit Account No. 06-1130. In the event that an extension of time is required, or may be required in addition to that requested in any petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 06-1130.

Respectfully submitted,

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